



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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Seattle, Washington 98101-3140

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-084

Mr. Carl Bach  
EHS Remediation Project Manager  
The Boeing Company  
P. O. Box 3707, M/C 1W-12  
Seattle, Washington 98124-2207

Re: Notification of Self-Implementing polychlorinated biphenyl (PCB) Cleanup for a North Boeing Field Substation Removal

Dear Mr. Bach:

This letter is in response to your notice of self-implementing cleanup pursuant to 40 Code of Federal Regulations (C.F.R.) §761.61(a) for removal and cleanup of Substation V-94 at North Boeing Field, Seattle, Washington dated March 11, 2014. As discussed with you via teleconference and documented in an e-mail from Dave Bartus of my staff on April 10, 2014, EPA provided you with several comments on the original notification and a request for additional information to address EPA's comments. Boeing provided a revised work plan to EPA on April 16, 2014 responsive to EPA's comments and information request.

In reviewing the April 16<sup>th</sup> revisions to the notification, EPA notes that Section 3.0 includes the following text:

"If concentrations of soil remaining in place are greater than the target remediation level of 1.0 mg/kg, the area will be cleaned up according to the 40 C.F.R. §761.61(a) requirements applicable to high occupancy areas with PCB remediation waste remaining at concentrations greater than 1.0 mg/kg and less than or equal to 10 mg/kg."

Although this text is consistent with requirements of 40 C.F.R. §761.61(a)(4)(i), the notification does not provide any details of the cap required for cleanup of high-occupancy areas to PCB concentrations of between 1.0 mg/kg and less than or equal to 10 mg/kg. To address this concern, EPA is approving the April 16, 2014 notification with the condition that if Boeing is unable to demonstrate compliance with the target remediation level of 1.0 mg/kg total PCBs, Boeing will provide EPA with proposed changes to the notification pursuant to 40 C.F.R. §761.61(a)(3)(ii) that fully document how Boeing will comply with the cap and deed restrictions requirements of 40 C.F.R. of 40 C.F.R. §761.61(a)(7) and (8).

If you have any questions pertaining to this conditional approval, please contact Dave Bartus of my staff at 206.553.2804, or [Bartus.dave@epa.gov](mailto:Bartus.dave@epa.gov).

Sincerely,

Kelly McFadden, Manager  
Pesticides and Toxics Unit

cc: Mark Edens, Ecology